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Terry A. Dake - 009656

Attorney for Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re:)	In Chapter 7 Proceedings
)	
WILLIAM JAY ADLER,)	
TRUDI BARBARA ADLER,)	Case No. 2:17-BK-01813-MCW
)	
Debtors.)	
<hr/>		
ROBERT A. MACKENZIE,)	
TRUSTEE,)	Adversary No. 2:17-AP-488
)	
Plaintiff,)	
v.)	
)	
SAMUEL GOLDSTEIN)	
SUSAN M. GOLDSTEIN,)	
)	
Defendants.)	
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NOTICE OF BAR DATE FOR OBJECTIONS TO TRUSTEE'S MOTION

PLEASE TAKE NOTICE that the trustee has filed the attached motion with the Court. Your rights may be affected by this motion.

You should read these papers carefully, and discuss them with your attorney if you have one. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the trustee's motion, or if you want the court to consider your views on the trustee's motion, then on or before **November 1, 2018**, you or your attorney must file with the Court a written response setting forth your concerns and requesting a hearing on the trustee's motion. Your response must be filed with the Court at:

1 Clerk Of The Court
2 United States Bankruptcy Court
3 230 N. First Ave.
4 Ste. 101
5 Phoenix, Arizona 85003-1706

6 If you mail your response to the Court, you must mail it
7 early enough so the Court will receive it on or before the date stated
8 above.

9 You must also mail or e-mail¹ a copy of your response to the
10 attorney for the trustee at:

11 Terry A. Dake, Esq.
12 **TERRY A. DAKE, LTD.**
13 20 E. Thomas Rd.
14 Suite 2200
15 Phoenix, Arizona 85012-3133
16 tdake@cox.net

17 If you or your attorney do not take these steps, the Court
18 may decide that you do not oppose the trustee's motion and may enter
19 an order that grants the trustee's motion without further notice or
20 hearing.

21 DATED October 6, 2018.

22 **TERRY A. DAKE, LTD.**

23 By /s/ TD009656
24 Terry A. Dake
25 20 E. Thomas Rd.
26 Suite 2200
27 Phoenix, Arizona 85012-3133
28 Attorney for Trustee

¹ E-mailed papers must be in pdf format.

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4 **Terry A. Dake - 009656**

5 Attorney for Trustee

6 **IN THE UNITED STATES BANKRUPTCY COURT**

7 **FOR THE DISTRICT OF ARIZONA**

8 In re:) In Chapter 7 Proceedings
9)
10 WILLIAM JAY ADLER,)
TRUDI BARBARA ADLER,) Case No. 2:17-BK-01813-MCW
11 Debtors.)

12)
13 ROBERT A. MACKENZIE,)
TRUSTEE,) **Adversary No. 2:17-AP-488**
14 Plaintiff,)
15 v.)
16 SAMUEL GOLDSTEIN)
SUSAN M. GOLDSTEIN,)
17 Defendants.)

18 **MOTION TO APPROVE COMPROMISE**

19 The trustee moves this Court for the entry of an order
20 approving a compromise of this adversary proceeding. The trustee's
21 motion is more fully set forth in and is supported by the following
22 Memorandum Of Points and Authorities.

23 DATED October 5, 2018.

24 **TERRY A. DAKE, LTD.**

25 By /s/ TD009656
26 Terry A. Dake - 009656
27 20 E. Thomas Rd.
Suite 2200
28 Phoenix, Arizona 85012-3133

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In order to resolve this litigation, but without admitting the claims and defenses that have been asserted, the parties have reached the following agreement, subject to approval by this Court:

2. The trustee shall pay to the defendants \$2,500.00 from the proceeds of the sale of the Piano. Payment shall be made by the trustee from the sale proceeds of the Piano not later than 14 days after the entry of an order approving this settlement.

4. The defendants shall not contest any application for administrative expense filed by counsel for the trustee.

5. After payment of the \$2,500.00 to the defendants in full, the trustee shall lodge an order providing for the dismissal of this adversary proceeding with prejudice, with each party to bear their own attorneys' fees and costs.

In light of the amounts at issue, and the costs and uncertainties of additional litigation, the trustee believes that the proposed compromise is reasonable and in the best interest of the

1 estate. The proposed compromise avoids the delay, expense and
2 uncertainty of additional litigation and provides a return to the
3 estate.

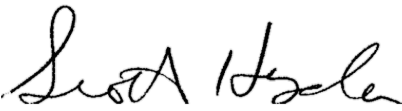
4 **WHEREFORE,** the trustee prays for the entry of an order
5 approving a compromise as set forth herein.

6 DATED October 5, 2018.

7 **TERRY A. DAKE, LTD.**

8 By /s/ TD009656
9 Terry A. Dake - 009656
20 E. Thomas Rd.
10 Suite 2200
Phoenix, Arizona 85012-3133

11 **APPROVED AND AGREED:**

12 
13

SCOTT W. HYDER
14 LAW OFFICE OF SCOTT W HYDER PLC
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